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CRITERIA FOR EVALUATING FEDERAL EDUCATION PROGRAMS.
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CRITERIA ARE SUGGESTED FOR REVIEWING THE PURPOSE, METHOD, AND DESIGN OF EXISTING AND PROPOSED FEDERAL GRANT PROGRAMS FOR PUBLIC SCHOOLS. EVALUATION OF EXISTING FEDERAL EDUCATIONAL PROGRAMS IS NECESSITATED BY THEIR INCREASINGLY COMPLEX RELATIONSHIP WITH STATE AND LOCAL PROGRAMS. OF PRIMARY CONCERN ARE THE PURPOSE OF FEDERAL EDUCATIONAL PROGRAMS, THE EFFECTIVENESS OF ADMINISTRATIVE RELATIONS FOR SOUND FEDERAL-STATE-LOCAL RELATIONSHIPS, AND THE COMBINED EFFECT OF ALL FEDERAL PROGRAMS IN THE DEVELOPMENT OF ADEQUATE PUBLIC SCHOOLS IN ALL STATES. GOALS INCLUDE PROVISION OF SPECIAL PURPOSE GRANTS FOR EDUCATING DISADVANTAGED CHILDREN, COMPENSATION FOR DEFICIENCIES IN THE SCHOOL TAX BASE RESULTING FROM THE TAX-EXEMPT STATUS OF FEDERAL PROPERTY, AND FINANCING OF RESEARCH AND DEVELOPMENT PROGRAMS FOR EDUCATIONAL IMPROVEMENT. IT WAS SUGGESTED THAT FEDERAL PROGRAM ADMINISTRATION SHOULD BE COORDINATED WITH STATE AND LOCAL PROGRAMS THROUGH STATE DEPARTMENTS OF EDUCATION. AS FEDERAL CATEGORICAL AID BECOME OPERATIVE, PROVISION SHOULD BE MADE FOR THE STATE TO ADJUST ITS GRANT PROGRAM TO LOCAL SCHOOL SYSTEMS IN ORDER TO REALIZE OPTIMUM ALLOCATION OF TOTAL FUNDING. DISCRETIONARY ALLOCATION OF FEDERAL PROGRAM FUNDS SHOULD BE MINIMIZED BY THE APPLICATION OF OBJECTIVE FORMULAS. ONLY THROUGH A TAX-SHARING PLAN OR SOME OTHER FORM OF FEDERAL SUPPORT WILL ADEQUATE PUBLIC SCHOOL PROGRAMS BE DEVELOPED IN ALL STATES. (JK)

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by

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An important stage has been reached in the development of Federal-state-local relations in the field of education which requires a comprehensive evaluation of existing Federal programs, especially those enacted in recent years. This is a difficult task. It involves gathering and comparing evidence concerning the social utility and individual benefits of many interrelated educational programs with their costs. Although it is easy to talk about "input-output analyses" and the "cost-effectiveness ratios" of educational programs, the actual process of comparing costs and benefits is extremely complex.

The first step in the evaluation process is to decide what evidence is needed, and what criteria will be used for assessing the merits of each Federal program and the combined effect of all Federal programs in the field of education. There are three basic questions that must be answered: (1) Is the purpose of the program worthy and appropriate to the Federal Government? (2) Are the administrative arrangements effective and conducive to sound Federal-state-local relationships? (3) Does the combined effect of all Federal programs promote the development of adequate public schools in all states?

Historically, there have been two major efforts to establish criteria for Federal programs in education. In 1931, the National Advisory Committee on Education, appointed by President Hoover, issued a report entitled "Federal Relations to Education." In this report the Committee declared that the American people are justified in using their Federal tax system to give financial aid to education in the states, provided they do this in a manner that does not delegate to the Federal Government any control of the social purposes or specific processes of education. This committee also emphasized that Federal funds should be granted to the states to aid education as a whole and not as special grants for the stimulation of particular types of training, and that the Federal Government should render large "intellectual assistance" to the states in matters of education through scientific research.

This report, issued in 1931 under a Republican administration, suggests criteria which would be equally applicable today. A few years later, in 1938, a new committee appointed by President Roosevelt gave its views concerning the role of the Federal Government in education. The report of the United States Advisory Committee on Education stated that grants should be made available to the states for "All types of current operating expenses for public elementary and secondary schools"; that the states should be permitted to use part of their Federal funds for books, transportation and scholarships for children attending both public and non-public schools; and that the American people would rightly object to any attempt to use the Federal aid as a means of controlling the content or processes of education in school. Thus the committee appointed by President Roosevelt also favored general purpose grants without Federal control in preference to categorical aids for education.

Despite these announced principles, the distrust of state and local management of public education which characterized the past decade ushered in a period of

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proliferating Federal categorical aids for education. These special programs must now be re-examined and evaluated.

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Is the Purpose of Each Program Worthy and Appropriate to the Federal Government?

In deciding what educational purposes are worthy and appropriate for the Federal Government, first consideration should be given to those educational problems which transcend state lines. Recent events have shown that educational neglect in one state can be a factor contributing to riot in another. Since educational deficiencies cannot be quarantined within state boundaries, educational isolationalism practiced by individual states cannot be sound national policy. The Federal Government clearly has a responsibility to act to strengthen public schools in all states. Only by so doing can a state by protected against the spillover effects of educational neglect in other states. Thus, one worthy and appropriate purpose of Federal action is to make general purpose grants to states to supplement state and local funds and to encourage states to expend for public schools amounts needed to maintain an adequate basic school program for all children and youth who choose to attend the public schools.

In addition to its general concern for strengthening the total ongoing public school program in each state, the Federal Government has a special responsibility to assist in the education of disadvantaged children. This responsibility has its origins deep in the history of our country, although immediate concern arises partly from the large number of educationally disadvantaged families that have migrated from one state to another in recent years. Thus, a second worthy and appropriate purpose of Federal action is to provide special purpose grants for compensatory or remedial education to assist states in educating disadvantaged children.

The Federal Government has increasingly accepted responsibility for reducing unemployment, and Congress has, in recent years, enacted a number of laws to this end. But unemployment cannot be eliminated without suitable vocational education programs in all states. In order to meet its responsibility for full employment, a worthy and appropriate purpose of Federal action is to provide special grants to states for vocational education including vocational programs for adults.

The chief source of local revenues for public schools is the property tax. More than half of all revenues of public schools are derived from this source. The Federal Government is the largest property owner in the United states and its property is tax-exempt. This condition obviously leaves a large gap in the tax base of America's public schools. A worthy and appropriate purpose of Federal action is to remedy this gap by making contributions to public schools to compensate for deficiencies in the school tax base resulting from the tax-exempt status of Federal property.

In the past the Federal Government has made contributions for the education of individuals for whom it accepts a special responsibility. The education of native Indian children is a case in point. More recently, contributions have been made for the education of veterans and for Cuban refugees. These obligations have been properly accepted by the Federal Government. It is, therefore, a worthy and appropriate purpose of Federal action to contribute toward the cost of education for veterans and for other individuals for whom the Federal Government has accepted a special responsibility.

Common to all states is a need to improve education through research and development programs. If each state were to finance all of its own educational research and development, excessive costs or inadequate programs or both would be

inevitable. Therefore, as a service to all schools, it is a worthy and appropriate purpose of Federal action to finance research and development programs designed to improve the quality of education in all states.

If a Federal educational program is designed to accomplish one or more of the foregoing six purposes it should receive a favorable rating under question number one.

Are the Administrative Arrangements Effective and Conducive to Sound Federal-State-Local Relationships?

Worthiness and appropriateness of purpose are not enough. If the Federal-state-local partnership is to function to maximum advantage, the assignment of responsibilities to each partner must utilize the special strengths of each while compensating for his weaknesses. Moreover, each partner must perform his duties without interfering unnecessarily with the essential contribution of the other two partners.

Historically and legally the state government occupies a central role in the public school partnership. If the total public school program is to function effectively, the state must be in a position to coordinate Federal programs with state and local programs and to provide needed supervision and direction. For this reason Federal programs should not by-pass state governments; instead Federal grants for public schools should be made to state departments of education to be allocated to local schools by them in accordance with state plans. This arrangement not only respects the central role of state governments in the field of education but also avoids excessive growth of the Federal bureaucracy.

Over a period of years, states have developed elaborate plans for granting state funds to local school systems. More recently, the Federal Government has launched a number of categorical aid programs. Inevitably some of the new Federal programs duplicate the purpose of some existing state-aid programs. For example, some states have provided aid to local school districts for compensatory or remedial education. With the recent entrance of the Federal Government into this field it may be in the best interest of education for the state to transfer some of its funds to other equally important purposes. To permit such flexibility in the use of state funds, when the Federal Government and a state grant funds to local school districts for the same or for closely related purposes the Federal grant should not be contingent upon continuation of the state grant. Only by preserving the right of the state to adjust its grant program can the state discharge its obligation to the overall education partnership.

The amounts of Federal funds to which individual states or local school districts are entitled should be determined by objective formulas, reducing to a minimum discretionary power of Federal officers in the allocation of school funds. Any grant-in-aid program which authorizes Federal officers to use broad discretion in allocating school funds among states or local school systems will encourage political favoritism, and another by-product will be the proliferation of expert proposal and justification writers.

In order to promote the efficient use of Federal funds and to encourage sound state and local planning, Federal contributions should be generally predictable for long-range planning purposes and specifically predictable for year-to-year planning. Effective use of Federal grants not only requires planning but also sufficient lead time to recruit personnel and obtain facilities and equipment. Boards of education should know at budget-making time the amount of Federal funds they will receive during the ensuing year.

In the interest of effective administration and sound intergovernmental relations, the Federal Government should avoid having several departments grant funds for the same or closely related public school purposes. For example, in the field of vocational education there are several programs administered by different agencies making grants to local school systems. A single Federal program working through a comprehensive state plan for vocational education would avoid much confusion and would be more effective in achieving the purposes of the Federal Government.

The accounting and auditing safeguards for Federal grant funds should utilize the procedures that the states require to safeguard their grants to local school systems. Separate accounting and auditing procedures for Federal funds should be superimposed on state requirements for local accountability for state and local funds only if the latter are inadequate. Moreover, although the Federal Government might in the case of categorical grants specify the purpose for which the funds are to be used, great freedom should be allowed to the local school system in selecting the method by which the purpose is to be achieved. This type of operational freedom is necessary if the local partner is to do his job effectively.

These criteria should be helpful in determining if the administrative arrangements of a Federal program are effective and conducive to sound Federal-state-local relations.

Does the Combined Effect of all Federal Programs Promote the Development of Adequate Public School Programs in all States?

Evaluation of the Federal Government's activities in the field of education cannot be made by looking only at each individual program; in addition, the combined effect of all programs must be considered. It is only in this way that gaps can be detected and that the cumulative effect of various programs can be assessed.

Serious questions have been raised about the effective operation of Federal aid programs. It has been charged that the combined effect of numerous categorical aids has produced a deluge of red tape that has hampered public school functioning; that educational talent is being wasted in writing up applications for small amounts of Federal money; that the emphasis upon innovation, and the search for funds to subsidize it, has resulted in the neglect of programs which have proved valuable in the past. In short, there is a growing conviction that the expanding list of Federal categorical aids has produced confusion, instability, and distortion of educational emphasis.

Hopefully, the proliferation of small Federal grants for special programs and projects in education has run its course and the nation is ready to re-examine and to consolidate these grants into broad programs of continuing support for education. Before this is done, it will be useful to consider new plans for the disbursement of Federal funds, such as tax sharing arrangements (the "Heller plan") as well as general Federal aid for education proposals.

The tax sharing plan, under which a part of the Federal income tax revenues would be returned to the states for general governmental purposes, has certain advantages. It places greater responsibility upon state legislatures, and it does not penalize in any way the state in which a large proportion of the children attend parochial schools. Also, most tax-sharing plans are designed to benefit, in addition to education, other important services traditionally rendered by state and local governments, thus improving the total operation of public services.

On the other hand the tax-sharing plan affords no assurance that states will provide satisfactory programs of public education. To provide such assurance it may be necessary for the Federal Government to adopt a public school incentive plan in which payments are made to states in proportion to their expenditures for public schools.

Under such a plan, a prescribed percent of state and local public school expenditures would be multiplied by state matching ratios, computed by dividing the national average per capita income by the per capita income of each state. For example, if the prescribed percent were 10 percent, then a state in which the income per capita equals the national average would receive a Federal grant equal to 10% of the amount it raised for public schools from state and local sources. However, a "poor state" in which the income per capita equals one-half of the national average would receive a Federal grant equal to 20 percent of the amount it raised for public schools from state and local tax sources. And a "rich state" in which the income per capita equals twice the national average, would receive a Federal grant equal to 5 percent of the amount it raised for public schools from state and local sources.

The Federal responsibility is clear. Without a Federal tax sharing plan or some form of general Federal support for the ongoing public school program, there is no assurance that all states can and will develop adequate public school programs. And without the development of adequate public school programs in all states, the Federal Government falls short of discharging its responsibility to the American people.

Summary of Proposed Criteria for Federal Grants to Public Elementary and Secondary Schools

The Federal Government can contribute much to elementary and secondary education. It brings to the local-state-Federal partnership in education:

- A national perspective on the need for education with a view to implementing basic national goals such as national defense, economic growth, full employment, and civil rights

- A financial resource for school support unhampered by low economic ability and unfettered by state and local fears of losing individual and industrial taxpayers to low tax areas

- A large-scale ability and efficiency in research and development programs of common value to educational improvement in all states.

But there are inherent limitations to the Federal role:

- While education is the only concern of the local board of education and is a major concern of state government, it is but one of many concerns of the Federal Government. In many ways, education is more important to the Federal Government for its value in implementing other national and international goals than it is as a goal itself.

- Of the three partners, the Federal Government is farthest removed from the classroom where teaching and learning occur. It is least able to recognize and provide specifically for the educational needs of different communities, of different schools, and of different children.

With the recent expansion of Federal activities in education, it is important at this time to examine the role of the Federal Government in financing elementary and secondary schools and the Federal programs for implementing that role. Three basic questions must be asked concerning each existing or proposed Federal program:

a. Is the purpose worthy and appropriate to the Federal Government?

b. Is the method effecitve for accomplishing the purpose?

c. Is the design of the program conducive to sound local-state-Federal relationships?

For most Federal programs, the purpose is examined extensively in Congressional hearings and public debate. But the method and design often receive very little attention. Public attention usually focuses on questions of the worthiness of the purpose of a new program rather than upon the questions of the effectiveness of the method or of the contribution of the program to sound intergovernmental relationships.

Legally, control of education is vested in the states and delegated by them to local school authorities. The Federal Government has no direct control of state and local school systems, but the threat of Federal control is emerging with the growing number of special grant programs which employ a fiscal mechanism of control and administration. In the absence of a broad Federal program to support elementary and secondary education, the proliferation of these special grant programs with project proposals, matching funds, and other specific requirements are fragmenting and weakening state and local control of education.

This statement sets forth criteria for the review of existing and proposed Federal grant programs for public schools. The criteria are based on a point of view which balances (a) the need for general aid to education and, in some cases, for special aids, and (b) the need to preserve state and local control of education. The criteria are as follows:

1. The major contribution of the Federal Government to the partnership should be made through a basic financial program of support to the states. General aid for elementary and secondary education should be available to all pupils and programs as determined by local and state plans for improving educational opportunity.

2. The Federal share of fiscal support of elementary and secondary schools when combined with state and local tax resources should be sufficient to provide adequate educational services and facilities in all state-local school systems.

3. The amount of aid should be generally predictable for long-range planning and specifically predictable for year-to-year planning. School programs require planning and sufficient time to recruit personnel and obtain facilities and equipment. If the partnership is to function efficiently, it is necessary for local boards of education to know at budget-making time the amount of Federal funds they will receive during the ensuing year.

4. The amounts of Federal funds to which individual states or local school districts are entitled should be determined by objective formulas, reducing to a minimum the discretionary power of Federal officials. The formula for distributing Federal funds should recognize the wide variation in the states' ability to finance education.

5. Federal funds for education should be allocated to state governments to be distributed to local schools by them in accordance with state plans. This general

method of administering Federal funds for education permits the state to play its crucial and appropriate role in the coordination of Federal and state programs.

6. The accounting and auditing safeguards for Federal grant funds should be applied at the state level utilizing the procedures that are required by the states to safeguard state grants to local school systems. Separate accounting and auditing procedures for Federal funds should not be superimposed on state requirements for local funds.

7. Special purpose grants appropriately supplement general purpose grants to stimulate the development of educational programs of critical national concern; to finance the research, development, and demonstration phases of special educational problems; or to meet the Federal Government's obligation as a landowner and employer for payments in lieu of local property taxes. Special grants should be limited in number and should comprise a small portion of the total Federal aid. All special grant distributions should be reviewed by the Congress periodically, and the funds should be transferred to the general purpose grant funds when the specified purpose of the grant has been accomplished.

8. All Federal educational programs should be administered by the U.S. Office of Education at the Federal level, by the state educational agency at the state level, and by the local educational agency at the local level. Interests of other Federal agencies in educational programs, in the field of health, welfare, labor, and others should be coordinated by the U.S. Office of Education.

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